Service Order Accuracy

❖ Lack of CLEC Involvement in Changes

❖ Flaws in Current Measure

- Sampling Methodology - BellSouth methodology for product sample sizes is suspect. The tables in the March 1, 2002 ex parte raise more questions.

- Inclusion of mechanized orders skews results

- Aggregate Reporting of Population prevents analysis of universe vs. sample size for mechanized vs non-mechanized orders. (March 1 ex parte)

- Service Order Sample Size Decreased, Undetected Errors

- Regionality is Inappropriate

- Completeness of Population Suspect

	3/15/02 Ex Parte	12/01 MSS Report
Resale Residence	140,535	140,068
Resale Business	6,647	6,047
Resale Design	186	353
UNE	85,348	179,046

❖ DOJ Comments

- *This significance of the improvements in BellSouth's service order accuracy is unfortunately obscured by significant changes in how BellSouth has measured accuracy starting with November data. (Page 13)*

- *BellSouth has provided data restating the service order accuracy metrics for September and October 2001 using its current methodology. These results indicate that for those months, performance is substantially better under the new method than the performance BellSouth had reported pursuant to the old method. (Page 13, footnote 57)*

❖ KPMG Involvement

❖ Florida Test Status

❖ Implementation of New Measure

Regional Data-Service Order Accuracy
October 2001-January 2002

	Resale	Oct.	Nov.	Dec.	January
1	Residence/<10 circuits/Dispatch/GA(%)	5	65	75	74
2	Residence/<10 circuits/Non-Dispatch/GA(%)	275	140	75	75
3	Residence/>=10 circuits/Dispatch/GA(%)		16	5	11
4	Residence/>=10 circuits/Non-Dispatch/GA(%)	1			
5	Business/<10 circuits/Dispatch/GA(%)	18	70	40	125
6	Business/<10 circuits/Non-Dispatch/GA(%)	262	135	35	74
7	Business/>=10 circuits/Dispatch/GA(%)		23	17	12
8	Business/>=10 circuits/Non-Dispatch/GA(%)	2	31	28	20
9	Design (Specials)/<10 circuits/Dispatch/GA(%)	6	50	63	49
10	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	2	55	45	76
11	Design (Specials)/>=10 circuits/Dispatch/GA(%)		3	2	
12	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)		25	6	10
	Total	571	613	391	526

	UNE	Oct.	Nov.	Dec.	Jan.
13	Design (Specials)/<10 circuits/Dispatch/GA(%)	101	200	45	75
14	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	45	30	48	75
15	Design (Specials)/>=10 circuits/Dispatch/GA(%)		35	19	13
16	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)	2			
17	Loops Non-Design/<10 circuits/Dispatch/GA(%)	93	35	75	75
18	Loops Non-Design/<10 circuits/Non-Dispatch/GA(%)	289	300	100	75
19	Loops Non-Design/>=10 circuits/Dispatch/GA(%)	7	70	70	115
20	Loops Non-Design/>=10 circuits/Non-Dispatch/GA(%)	15	58	80	114
	Sub-Total	22	128	150	229
	Total	552	728	437	542

BellSouth is actually sampling less service orders than it did under the prior methodology. BellSouth issues a minimum of two service orders for every UNE LSR submitted (N and D—In many cases other orders such as directory listings, trigger orders, etc. must also be issued). Under the previous methodology BellSouth evaluated all service orders associated with the sampled population, but reported at the LSR level (Varner p. 64 bullet one). Now BellSouth has "refocused the measurement to include only sampled SOs" (Varner p.66). As the table of SOA results illustrates, the aggregate number of service orders has been drastically reduced. For example, UNE October (created under the old methodology) Total reports 552 LSRs, which should have involved over 1100 service orders. Future months all have far fewer Service Orders in the count. (This difference is exacerbated by the fact that additional products were added to the sample effective with the November report.)

Service Order Accuracy

PMR4-15-1	The selected raw data and the corresponding early-stage data agree.	Satisfied	KCI found no disagreement between the selected raw data values and the corresponding early-stage data, based on a comparison of information from the selected local service requests and their associated service orders for September 1999.
PMR4-15-2	All of the selected early-stage data were accounted for in the raw data.	Satisfied	KCI found no inappropriate deletions from the population of service orders before drawing the sample of service orders used for the SQM calculation.

Provisioning Accuracy Tests

	E/O	Test #	Description
1	O-82	TVV4 (6/13/01)	BellSouth's systems or representatives did not update Customer Service Records consistently following a change in the status of a customer's account.
2	E-76	TVV4 (6/28/01)	BellSouth failed to provision disconnect orders properly with the expected intercept recording message.
3	E-84	TVV4 (7/10/01)	BST failed to use the proper codes when provisioning switch translations.
4	O-106	TVV4 (8/14/01)	BST's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG.
5	E-112	TVV4 (10/01/01)	BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG.
6	E-156	TVV4 (12/12/01)	BellSouth failed to use the proper codes when provisioning OS/DA. (Previously observation O-152)
7	E-139	TVV4 (01/24/02)	BST's line loss report does not provide enough detail for CLECs to properly identify account activity.

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March 1, 2002

WRITTEN EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Ms. Salas:

I am providing you with a hard copy of two documents that I sent electronically to Daniel Shiman of the Commission's Common Carrier Bureau on March 1, 2002. The first document shows the number of service orders sampled to determine BellSouth's Service Order Accuracy performance for January, 2002 in Georgia that were mechanized, the subset of those mechanized orders with errors, and the resulting error rate. The second document shows the number of service orders sampled to determine BellSouth's Service Order Accuracy performance for January 2002 in Georgia that were non-mechanized (i.e., were either partially mechanized or manual), the subset of those non-mechanized orders with errors, and the resulting error rate. The e-mailed documents were sent to Mr. Shiman at his request. I am also sending a copy of this document to James Davis-Smith of the Department of Justice's Telecommunications Task Force

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachment and requesting that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachments

cc: Daniel Shiman (w/o attachment)
       Susan Pié
       James Davis-Smith

GA January 2002 MSS Report - Mechanized Orders

Auto Number	SOA Product Classification	Population	Volume	Errors	Error Rate
1	Resale Residence < 10 Circuits Non-Dispatched	130630	58	2	3.45%
2	Resale Residence > = 10 Circuits Non-Dispatched	0	0	0	NA
3	Resale Residence < 10 Circuits Dispatched	6998	51	2	3.92%
4	Resale Residence > = 10 Circuits Dispatched	11	9	0	0.00%
	Resale Residence Mechanized	137639	118	4	3.39%
5	Resale Business < 10 Circuits Non-Dispatched	4600	36	1	2.78%
6	Resale Business > = 10 Circuits Non-Dispatched	20	0	0	NA
7	Resale Business < 10 Circuits Dispatched	1001	73	6	8.22%
8	Resale Business > = 10 Circuits Dispatched	14	1	0	0.00%
	Resale Business Mechanized	5635	110	7	6.36%
9	Resale Design < 10 Circuits Non-Dispatched	104	2	0	0.00%
10	Resale Design > = 10 Circuits Non-Dispatched	14	0	0	NA
11	Resale Design < 10 Circuits Dispatched	50	3	0	0.00%
12	Resale Design > = 10 Circuits Dispatched	0	0	0	NA
	Resale Design Mechanized	168	5	0	0.00%
13	UNE Design < 10 Circuits Non-Dispatched	353	43	0	0.00%
14	UNE Design > = 10 Circuits Non-Dispatched	0	0	0	NA
15	UNE Design < 10 Circuits Dispatched	5261	15	0	0.00%
16	UNE Design > = 10 Circuits Dispatched	29	2	0	0.00%
	UNE-Design Mechanized	5643	60	0	0.00%
17	UNE Non-Design < 10 Circuits Non-Dispatched	88022	53	0	0.00%
18	UNE Non-Design > = 10 Circuits Non-Dispatched	116	6	1	16.67%
19	UNE Non-Design < 10 Circuits Dispatched	5423	19	0	0.00%
20	UNE Non-Design > = 10 Circuits Dispatched	115	12	0	0.00%
	UNE Non-Design Mechanized	93676	90	1	1.11%
	Totals	242761	383	12	3.13%

Check of Total	242761

GA January 2002 MSS Report - Non Mechanized Orders

Auto Number	SOA Product Classification	Population	Volume	Errors	Error Rate
1	Resale Residence < 10 Circuits Non-Dispatched	130630	17	0	0.00%
2	Resale Residence > = 10 Circuits Non-Dispatched	0	0	0	NA
3	Resale Residence < 10 Circuits Dispatched	6998	23	5	21.74%
4	Resale Residence > = 10 Circuits Dispatched	11	2	1	50.00%
	Resale Residence Non-Mechanized	137639	42	6	14.29%
5	Resale Business < 10 Circuits Non-Dispatched	4600	38	4	10.53%
6	Resale Business > = 10 Circuits Non-Dispatched	20	20	3	15.00%
7	Resale Business < 10 Circuits Dispatched	1001	52	10	19.23%
8	Resale Business > = 10 Circuits Dispatched	14	11	1	9.09%
	Resale Business Non-Mechanized	5635	121	18	14.88%
9	Resale Design < 10 Circuits Non-Dispatched	104	74	3	4.05%
10	Resale Design > = 10 Circuits Non-Dispatched	14	10	3	30.00%
11	Resale Design < 10 Circuits Dispatched	50	46	1	2.17%
12	Resale Design > = 10 Circuits Dispatched	0	0	0	NA
	Resale Design Non-Mechanized	168	130	7	5.38%
13	UNE Design < 10 Circuits Non-Dispatched	353	32	0	0.00%
14	UNE Design > = 10 Circuits Non-Dispatched	0	0	0	NA
15	UNE Design < 10 Circuits Dispatched	5261	60	0	0.00%
16	UNE Design > = 10 Circuits Dispatched	29	11	0	0.00%
	UNE-Design Non-Mechanized	5643	103	0	0.00%
17	UNE Non-Design < 10 Circuits Non-Dispatched	88022	22	1	4.55%
18	UNE Non-Design > = 10 Circuits Non-Dispatched	116	108	0	0.00%
19	UNE Non-Design < 10 Circuits Dispatched	5423	56	2	3.57%
20	UNE Non-Design > = 10 Circuits Dispatched	115	103	2	1.94%
	UNE Non-Design Non-Mechanized	93676	289	5	1.73%
	Totals	242761	685	36	5.26%

Check of Total	242761